



Anthony Grandinette <grandinettelaw@gmail.com>

discovery update continued

1 message

Anthony Grandinette <grandinettelaw@gmail.com>

Tue, Jul 29, 2014 at 5:37 PM

To: "Zwilling, Arlene" <arlene.zwilling@suffolkcountyny.gov>

Dear Arlene:

I inadvertently sent my prior e-mail before typing in the names of those police witnesses I intend to depose who are yet to be formally noticed. Below is the list so you can check on availability:

1. PO Nicholas Robbins Robbins
2. Det/Sgt Best;
3. Sgt. Kevin O'Rielly;
4. PO Joseph Simeone;
5. PO George Oliva;
6. PO John Boreshesky;
7. Det/Sgt John Best;
8. Det. Ronald Tavarese;
9. Det. Lesser;
10. Detective Alfred Cicotto;
11. PO Martin Cummings;
12. PO Klammer;
13. PO David Samartino;
14. One crime scene rep;
15. PA Dennis Kozik;
16. Deputy ME Odette R. Hall;

Could you please check for us and determine who was responsible for monitoring prisoner activity in the male holding cell area on the 7-3 shift and the subsequent shift to make sure we depose the relevant witnesses. I will forward you an interrogatory posing that question in the immediate future.

Lastly, we have the following noticed depositions which need to be rescheduled:

1. Lt. Crawford;
2. PO James Rios;
3. PO Janine Lesiewicz;

As per our prior discussions concerning electronic searches of the SCPD e-mail and computer based programs below is my proposed list of search terms:

1. Jack Franqui
2. Jack Franqui IV
3. Franqui

4. Simon Earl
5. Earl
6. 6 Cordwood Path, Shoreham

E-mails would be inter-departmental as well as to/from the New York State Department of Corrections and the Department of Justice.

Best, Tony

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